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REC'D TN  
REGULATORY AUTH.

Patrick Turner  
Attorney

JUL 5 PM 1 59

OFFICE OF THE  
EXECUTIVE SECRETARY  
JUL 5 2000

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Petition for Arbitration of BlueStar Networks, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996*

Docket No. 99-00945

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Responses to BlueStar's First Interrogatories. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Patrick W. Turner

PWT/jem

Enclosure

POSTED  
7-6-00

**CERTIFICATE OF SERVICE**

I hereby certify that on July 5, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Richard Collier, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

☒ Hand  
☐ Mail  
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Michael B. Bressman, Esquire  
BlueStar Networks  
401 Church St., 24<sup>th</sup> Fl.  
Nashville, TN 37219

☒ Hand  
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Henry Walker, Esquire  
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BellSouth Telecommunications, Inc.  
TN Docket 99-00945  
BlueStar Network's First Set of Data Requests  
May 3, 2000  
Item No. 1  
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EXECUTIVE SECRETARY

**REQUEST:** Please describe the extent to which BellSouth's recurring and nonrecurring UNE loop cost studies consider BellSouth's forwarding- looking deployment of bridge taps, and load coils, i.e., specifically what costs are associated with bridge taps and load coils in BellSouth's study, how were those costs derived, and specifically where in the study do they appear?

**RESPONSE:** Forward-looking bridged tap design for loops are explained in BellSouth's Cost Study Filing in Docket 97-01262, Section 3, Page 22 (provided in POD Item No. 1). Specifically, "bridged tap is designed to a maximum of 2,500 feet with a single bridged tap limited to 2,000 feet." Costs for bridged tap cable are included in the cost of the loop. There are no costs for load coils included in BellSouth's forward-looking loop design.

The 1997 Loop Model (Version 1.1) produces the material for an average loop by field reporting code based on a sampling of loop characteristics in the state of Tennessee. The loop samples with bridged tap sections are aggregated into like components for cost development. All bridged tap aggregate information is provided in Pages 2278 to 2290 (file 2w.xls) and identified in column H as 26bt or 24bt.

In addition, in Appendix A, Pages 3056 to 3149.4 and in mechanized file lbtn2w2.xls, the bridged tap sections of the redesigned loops can be identified in Column M as 26bt or 24bt.

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**REQUEST:** Please identify the overall number and percentage of loops in BellSouth's recurring cost study, and in its current network, that are provisioned with and without DLC systems (i.e., electronics).

**RESPONSE:** Based on the forward-looking, redesigned 1995 Loop Sample for Residence and Business loops in Tennessee, the mix of loops with DLC and without DLC is:

|           | Number | %  |
|-----------|--------|----|
| Fiber DLC | 274    | 56 |
| Copper    | 216    | 44 |

In the Compliance Filing dated December 1, 1999, as ordered by the TRA, the above percentages were revised to 70.38% for fiber DLC and 29.62% for copper.

Based on current network (12/31/1999) data for Tennessee, the mix of loops with DLC and without DLC is:

|           | Number    | %    |
|-----------|-----------|------|
| Fiber DLC | 1,032,063 | 34.1 |
| Copper    | 1,993,219 | 65.9 |

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**REQUEST:** Please identify the costs associated with converting an order for an xDSL capable loop to an order for an unbundled copper loop (UCL).

**RESPONSE:** BellSouth objects to Item No. 3 for the reasons set forth in its Objections filed May 10, 2000. Without waiving these objections, BellSouth responds that it has not computed the requested costs.

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Item No. 4  
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**REQUEST:** Please identify the costs associated with a service inquiry using the manual "Loop Make-Up Service Inquiry" process (LMUSI).

**RESPONSE:** BellSouth objects to Item No. 4 for the reasons set forth in its Objections filed May 10, 2000. Without waiving these objections, BellSouth responds that it has not completed the requested cost studies for Tennessee.

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Item No. 5  
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**REQUEST:** Please identify the nonrecurring costs associated with preordering and ordering an xDSL capable loop or UCL.

**RESPONSE:** BellSouth objects to Item No. 5 for the reasons set forth in its Objections filed May 10, 2000. Without waiving these objections, see BellSouth's Cost Study Filing in Docket 97-01262 (provided in POD Item No. 1) for the costs of xDSL compatible loops. The nonrecurring costs for xDSL compatible loops are currently under review and may be revised in a future filing. BellSouth has not filed UCL costs for Tennessee. A preliminary study for negotiation purposes is provided in POD Item No. 3.

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REQUEST: Please identify the costs associated with ordering and provisioning a UCL.

RESPONSE: See response to Data Request Item No. 5.

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REQUEST: Please identify the costs associated with electronically obtaining loop make-up information and/or electronically preordering or ordering loops.

RESPONSE: See response to Data Request Item No. 4.

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REQUEST: Please identify the costs associated with "conditioning" (i.e. removing load coils, bridge taps, disturbers, etc.) xDSL loops and UCLs.

RESPONSE: See response to Data Request, Item No. 5.

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Item No. 9  
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**REQUEST:** In instances where BlueStar requires a cross connect between BlueStar facilities included within a customers' premise (i.e. telephone closet, etc.) and BellSouth owns or controls inside wire facilities, will BellSouth allow BlueStar to provide its own cross connect?

**RESPONSE:** BellSouth does not own or control any "inside wire", that is wiring on the customer's side of the demarcation point. Relative to wiring within a building that is on BellSouth's side of the demarcation point (i.e., Intrabuilding Network Cable (INC) (a.k.a., riser cable)-and Network Terminating Wire (NTW)). BellSouth will allow BlueStar to provide its own cross-connect from BlueStar's facilities to an appropriate point of interconnection that facilitates interconnection to INC and NTW. This point of interconnection will be established by BellSouth's technicians and will provide the CLEC with access to INC and NTW as a UNE(s). In addition, this arrangement will maintain network integrity for both BellSouth and BlueStar. If a CLEC were to simply attach its facilities directly to BellSouth's facilities, end users could experience service interruptions and BellSouth could not properly inventory BellSouth's facilities. In this scenario, there would be no way to properly isolate troubles. This would jeopardize BellSouth's ability to provision, maintain and repair these facilities in the most efficient way.

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**REQUEST:** If BellSouth were asked to provide a cross connect between BlueStar facilities included within a customers' premise (i.e., telephone closet, etc.) and BellSouth owned or controlled inside wire facilities, what rate would BellSouth require BlueStar to pay to accomplish this function? Please provide estimates of any recurring and/or nonrecurring rates that would apply. Please also provide all documents, cost studies, or other materials that support such rates.

**RESPONSE:** BellSouth does not own or control any "inside wire", that is wiring on the customer's side of the demarcation point. Relative to wiring within a building that is on BellSouth's side of the demarcation point (i.e., Intrabuilding Network Cable (INC)), BellSouth has filed the following costs in the generic cost study Docket No. 00-00544:

2 & 4-Wire Intrabuilding Network Cable (INC)

Sub-Loop - Per Building Equipment Room - CLEC Feeder Facility Set-Up

Sub-Loop - Per Building Equipment Room - Per 25 Pair Panel Set-Up

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**REQUEST:** Please provide a list of all multitenant buildings in Nashville and Memphis, Tennessee, in which the building owners or managers have asserted ownership of the intrabuilding network cable (INC), riser cable or network terminating wire (NTW).

**RESPONSE:** BellSouth objects on the grounds that the information requested is not relevant to any issue in this proceeding, nor is it reasonably calculated to lead to the discovery of admissible evidence. The list of issues agreed to by the parties and approved by the Pre-Arbitration Officer and Arbitrators bears no relation to nor does it address "process for maintaining and providing documentation to CLECs regarding the location of and the establishment of demarcation points..." Without waiving these objections, BellSouth is not aware of any multitenant buildings in Nashville and Memphis where the owners or managers have asserted ownership of the INC and/or NTW.

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**REQUEST:** Please describe BellSouth's process for maintaining and providing documentation to CLECs regarding the location of and the establishment of demarcation points for multitenant buildings in Tennessee. This answer should include the name and phone and fax numbers for the BellSouth employee to contact when requesting such information for a building.

**RESPONSE:** BellSouth objects on the grounds that the information requested is not relevant to any issue in this proceeding, nor is it reasonably calculated to lead to the discovery of admissible evidence. The list of issues agreed to by the parties and approved by the Pre-Arbitration Officer and Arbitrators bears no relation to nor does it address "process for maintaining and providing documentation to CLECs regarding the location of and the establishment of demarcation points..."

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**REQUEST:** State the cost of removing load coils and bridge taps that BellSouth attributes to its own retail or wholesale ADSL service in any cost analysis. Please identify the specific cost analysis referenced in your response.

**RESPONSE:** BellSouth objects to Item No. 13 for the reasons set forth in its Objections filed May 10, 2000. For the costs of an Unbundled 2-Wire ADSL Compatible Loop, see BellSouth's Cost Study Filing in Docket 97-01262 (see POD Item No. 1). The nonrecurring costs for xDSL compatible loops are currently under review and may be revised in a future filing. Also, see response to Data Request Item No. 5.

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**REQUEST:** Please state by what date BellSouth will provide electronic access to loop make-up information in LFACS and any other BellSouth databases (including those databases accessed through Map Viewer).

**RESPONSE:** BellSouth plans to support providing electronically loop make-up data to CLECs via a loop make-up data pre-order query. Implementation is targeted for July, 2000. An electronic pre-order functionality via existing interfaces (LENS, RoboTAGtm, and TAG) will be provided for loop make-up data for facilities inventoried in BellSouth's Loop Facilities Assignment Control System ("LFACS"). The pre-order query will provide loop make-up data and will be available for all wire centers where the data is populated in LFACS.